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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

9 DUSTIN NEFF,

10 Plaintiff,

11 v.

12 SBA ENTERTAINMENT, LLC, et al,

13 Defendants.

Case No. 5:23-cv-02518-EKL

STATUS REPORT

1 Plaintiff Dustin Neff (“Neff” or “Plaintiff”) hereby submits this JOINT
2 STATUS REPORT pursuant to the Court’s order entered on April 9, 2025 (Dkt.
3 53).

4 Due to Defendants Chicken Soup for the Soul Entertainment, Inc.
5 (“CSSE”) and TOFG, LLC (“TOFG”)’s filing of Chapter 11 Bankruptcy (Dkts.
6 47, 47-1), this Court administratively closed this action as the claims against the
7 same on March 4, 2025. Dkt. 51. First filed on June 28, 2024, Defendants CSSE
8 and TOFG’s bankruptcy proceedings have been administered in the U.S.
9 Bankruptcy Court, District of Delaware under docket number 24-11442-MFW.
10 The bankruptcy court converted The Chapter 11 petition to a Chapter 7 petition
11 on July 10, 2024. 24-11442-MFW, Dkt. 122, 125. The docket is comprised of
12 over 600 documents, consisting mostly of creditors moving for relief from
13 automatic stays. The latest substantive entry entered on April 15, 2024 is a
14 Notice of Intent to Hold a Foreclosure Sale on April 23, 2025 which aims to sell
15 off CSSE and TOFG’s intellectual property, rights to enforce rights in the same,
16 documents, equipment, and other tangible and intangible property. 24-11442-
17 MFW, Dkt. 615.

18 Additionally, pursuant to the Court’s order, Neff will file a Motion
19 Seeking Leave to Amend the Complaint to add at least one more Defendant
20 within the next 14 days. Once the newly added party or parties appear and the
21 Court reopens the case, Plaintiff and any new parties can confer regarding a
22 proposed schedule and submit one for the Court’s review and approval.

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25 Dated: April 16, 2025

26 Respectfully submitted,
27 By: /s/ Scott Alan Burroughs
28 Scott Alan Burroughs, Esq.
DONIGER / BURROUGHS
Attorney for Plaintiff